

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS

WACO DIVISION

W93CRO46

UNITED STATES OF AMERICA,	*	CRIMINAL NO. _____
Plaintiff,	*	<u>I N D I C T M E N T</u>
V.	*	[18 U.S.C. 1117--Conspiracy
KATHRYN SCHROEDER (1)	*	to Murder Federal Officers;
BRAD EUGENE BRANCH (2)	*	18 U.S.C. 924(a)(1)--
KEVIN A. WHITECLIFF (3)	*	Possession of Firearm
Defendants.	*	During Commission of Crime
		of Violence]

COUNT ONE

[18 U.S.C. 1117]

THE GRAND JURY CHARGES:

From on or about February, 1993, and continuing thereafter up to and including the date of the filing of this Indictment, in the Western District of Texas, Defendants,

KATHRYN SCHROEDER  
BRAD EUGENE BRANCH  
KEVIN A. WHITECLIFF

did knowingly, willfully and unlawfully combine, conspire, confederate, and agree together and with each other, and with persons known and unknown to the Grand Jury, to kill, with premeditation and malice aforethought, Special Agents Steve Willis, Rob Williams, Conway LeBleu, and Todd McKeehan, all officers and employees of the United States as specified in Title 18, United States Code, Section 1114, in violation of Title 18, United States Code, Section 1117.

**OVERT ACTS**

In furtherance of such agreement and conspiracy and to effect the objects thereof, the Defendants and their conspirators, known and unknown, committed the following overt acts, among others:

1. On February 28, 1993, in the Western District of Texas, Special Agent Steven D. Willis of the Bureau of Alcohol, Tobacco, and Firearms was shot and killed by the conspirators while he was attempting to execute search and arrest warrants.

2. On February 28, 1993, in the Western District of Texas, Special Agent Robert Williams of the Bureau of Alcohol, Tobacco, and Firearms was shot and killed by the conspirators while he was attempting to execute search and arrest warrants.

3. On February 28, 1993, in the Western District of Texas, Special Agent Conway C. LeBleu of the Bureau of Alcohol, Tobacco, and Firearms was shot and killed by the conspirators while he was attempting to execute search and arrest warrants.

4. On February 28, 1993, in the Western District of Texas, Special Agent Todd W. McKeegan of the Bureau of Alcohol, Tobacco, and Firearms was shot and killed by the conspirators while he was attempting to execute search and arrest warrants.

All in violation of Title 18, United States Code, Section 1117.

**COUNT TWO**

[18 U.S.C. 924(c)(1)]

On or about February 28, 1993, in the Western District of Texas, Defendants,

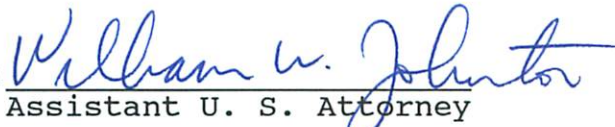
KATHRYN SCHROEDER,  
BRAD EUGENE BRANCH  
KEVIN A. WHITECLIFF

did knowingly use and carry a firearm during and in relation to the commission of a crime of violence which may be prosecuted in a court of the United States, to-wit: Conspiracy to Murder Officers and Employees of the United States, in violation of Title 18, United States Code, Sections 1117 and 1114, all in violation of Title 18, United States Code, Section 924(c)(1).

A TRUE BILL:

  
\_\_\_\_\_  
FOREPERSON

RONALD F. EDERER  
UNITED STATES ATTORNEY

By:   
\_\_\_\_\_  
Assistant U. S. Attorney